

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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FARAH JEAN FRANCOIS,

Case No.: 1:22-cv-4447-JSR

Plaintiff,

-against-

**SPARTAN AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI,
STAVROS ORSARIS,
YESSICA VALLEJO, and
DAVID PEREZ,**

Defendants.

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Declaration of Matthew A. Schedler

MATTHEW A. SCHEDLER, an attorney admitted in the United States District Court for the Southern District of New York and in the Courts of the State of New York, declares as true under penalty of perjury pursuant to 28 U.S.C. § 1746 that:

1. I was admitted to practice in the Courts of the State of New York in 2008.
2. Since November 2013, I have been Supervising Attorney for the Consumer Law Project of CAMBA Legal Services, Inc. ("CAMBA"), a nonprofit legal services organization that serves New York City.
3. I joined CAMBA's Consumer Law Project as a Staff Attorney in 2008, and was promoted to Senior Staff Attorney in 2012, before accepting my current position.
4. During my entire tenure at CAMBA, I have regularly represented consumers in both state and federal courts in New York City.

5. I have known Ms. Catherine since 2018 while she was working at The Law Office of Ahmad Keshavarz both from her participation in consumer rights advocacy and as co-counsel on a number of cases, including:

- a. *Tavano v. HK Recovery Group, Inc. et al*, 1:23-cv-08835-MKV (SD NY)
- b. *Centeno v. Asset Acceptance, LLC*, 1:18-cv-06464-KAM-RML (ED NY)
- c. *Calixto v. Balsamo & Rosenblatt, P.C. et al*, 1:18-cv-04675-MKB-SMG (ED NY)
- d. *Luciano v. M&T*, 1:23-cv-02233-EK-RML (ED NY)
- e. *Wilson v. Selip & Stylianou, LLP et al*, 1:24-cv-04108-ALC (ED NY)
- f. *Fritz v. LVNV Funding, LLC.*, 2019- cv-05255 (ED NY) (“*Fritz II*”)

6. In the above-cited cases, I reviewed her work at every stage of litigation, from drafting complaints to discovery motions to dispositive motions.

7. Based on my direct work with her, my opinion is that she is an excellent attorney demonstrating great skill, particularly as to writing memorandums of law.

8. In addition to the above listed case I have co-counseled with Ms. Catherine, I have also brought, often with a co-counseling firm, the following federal court cases:

- a. *Cruz v. Steven M. Feinberg, LLL, et al.*, S.D.N.Y. No. 2011-CV-00921.
- b. *Sheppard v. Peter T., Roach, et al.*, S.D.N.Y. No. 2011-CV-06352.
- c. *Rivera v. Bank of American, N.A.*, S.D.N.Y. No. 2013-CV-04559
- d. *Fernandez v. Banco Popular North America.*, S.D.N.Y. No. 2013-CV-005947
- e. *Reyes v. Autovest.*, S.D.N.Y. No. 2015-CV-002203
- f. *Brown v. Forster & Garbus, LLP, et al.*, S.D.N.Y. No. 2015-CV-006779
- g. *Garcia v. Citibank.*, S.D.N.Y. No. 2015-CV-01726
- h. *Creary v. Kavulich* , S.D.N.Y. No. 2015-CV-2277.
- i. *Weems v Autovest.*, S.D.N.Y. No. 2021-CV-10350
- j. *Morales v. Kavulich & Assocs., P.C.*, S.D.N.Y. No. 2016-CV-2134
- k. *Hunter v. Palisades Acquisition XVI, LLC*, S.D.N.Y. No. 2016-CV-8779
- l. *Jaisingh v. Synchrony Bank*, E.D.N.Y. No. 2024-cv-05595

- m. *Stephen v. Coinbase, Inc.*, E.D.N.Y. No. 2023- cv-01519.
- n. *Francis v. J.P. Morgan Chase Bank, N.A.*, E.D.N.Y. No. 2013- cv-04129
- o. *Rosas v. Arrow Financial Services, LLC*, E.D.N.Y. No. 2014- cv-06462.
- p. *Wilson v. Citibank.*, E.D.N.Y. No. 2014- cv-06650
- q. *Goris v. Bank of America.*, E.D.N.Y. No. 2015- cv-01558.
- r. *Mashore v. J.P. Morgan Chase Bank, N.A.*, E.D.N.Y. No. 2016- cv-07024.
- s. *Tims v. Citibank, NA.*, E.D.N.Y. No. 2018- cv-01702.
- t. *Fritz v. LVNV Funding, LLC et al*, 1:19-CV-5255 587 (ED NY) (“*Fritz I*”) (class action)

9. I regularly co-counsel and otherwise collaborate with members of the private consumer protection bar in New York City.

10. I am a member of the National Association of Consumer Advocates (“NACA”), which is professional association comprised of private, non-profit, and government lawyers who represent the interests of consumers.

11. I actively participate in the New York Consumer Advocates Task Force, which is comprised of both non-profit and private attorneys who represent the interests of consumers.

12. I have testified before the New York City Council and the New York State Assembly in support of legislation to strengthen consumer protection law.

13. I am recognized as an expert on consumer law, and regularly conduct trainings on defending consumers from collection actions; credit reporting; banking account and credit card fraud; the Fair Debt Collection Practices Act; and filing affirmative litigation in the context of a non-profit legal services program.

14. I teach a consumer law externship seminar as an adjunct law professor at Cardozo Law School

15. I am familiar with the billing rates and practices of attorneys handling complex federal

cases in the Southern District and Eastern District of New York.

16. Based on my education training and experience, it is my opinion that a reasonable hourly rate for Ms. Catherine time in this case is \$350. These fees are customary in the Southern District of New York for an attorney with her level of experience, reputation and ability, considering the nature of the controversy, the time limitations imposed, and the results obtained in this case.

17. As an active member of the consumer protection bar with knowledge of the range of results in these types of cases, I can say that obtaining a consent judgment of \$120,000 plus attorney's fees in an FCRA impermissible credit pull case is an excellent outcome.

Dated: New York, NY
December 22, 2024

/Matthew A. Schedler/

Matthew A. Schedler